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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

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12 PAMELA DITTMAR,
13 Plaintiff,

14 v.

15 CITY OF NORTH LAS VEGAS, a municipal
16 corporation,
17 Defendant.

Case No. 2:17-cv-02916-JAD-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINES FOR PLAINTIFF
TO FILE HER OBJECTION TO
DEFENDANT'S BILL OF COSTS [ECF
NO. 203], AND RESPONSE TO MOTION
FOR ATTORNEYS' FEES [ECF NO. 204]**

(First Request) ECF No. 205

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20 NOW COMES the Plaintiff, Pamela Dittmar, by and through her attorneys, Melanie Hill and
21 Melanie Hill Law PLLC, and Defendant, City of North Las Vegas, by and through its attorneys, R.
22 Todd Creer, Kaitlin H. Paxton, and Kamer Zucker Abbott, who hereby stipulate that the deadlines
23 for Plaintiff to file her objection to Defendant's Bill of Costs [ECF No. 203] and response to
24 Defendant's Motion for Attorneys' Fees [ECF No. 204] be extended from their current deadline of
25 March 12, 2024 to April 2, 2024, and April 5, 2024 respectively. This stipulation is filed pursuant to
26 Local Rule IA 6-1.

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1 This is the first request for an extension of both of these deadlines which all fall on the same
2 day, March 12, 2024. In support of this stipulation for extension of these deadlines, the parties state
3 as follows:

4 1. The current deadline for Plaintiff to file her objection to Defendant's Bill of Costs
5 [ECF No. 203] and response to Defendant's Motion for Attorneys' Fees [ECF No. 204] is March 12,
6 2024.

7 2. Counsel for Plaintiff will be out of town and on a cruise for her daughter's Spring
8 Break vacation from March 8-17, 2024. Due to the Wi-Fi issues Plaintiff's counsel experienced last
9 time on a cruise, counsel requested a stipulated extension of the deadline, while counsel is out of the
10 country for her daughter's Spring Break vacation. For this reason, as well as the good cause
11 articulated below, Plaintiff's counsel requested a stipulated extension of the deadline to file her
12 objection to Defendant's Bill of Costs [ECF No. 203] and her response to Defendant's Motion for
13 Attorneys' Fees [ECF No. 204] and Defendant's counsel agreed to stipulate to the requested
14 extensions.

15 3. Based on the foregoing, the parties stipulate to extend Plaintiff's deadline to file her
16 objection to Defendant's Bill of Costs [ECF No. 203] and her response to Defendant's Motion for
17 Attorneys' Fees [ECF No. 204] to April 2, 2024 and April 5, 2024 respectively.

18 4. This stipulation for an extension is brought in good faith, establishing good cause,
19 and is not sought for any improper purpose or other purpose of delay. Plaintiff's counsel is
20 requesting this stipulated extension to provide Plaintiff's counsel with sufficient time in light of
21 Plaintiff's counsel's need to take time off work to rest and recover after trial in this case. Counsel
22 was recently hospitalized in February, 2024 and has also been recovering from another illness
23 counsel was suffering from before and during trial in this case causing flu symptoms and preventing
24 counsel from working. Counsel was also out of state February 22-26, 2024 and will be out of the
25 office for her daughter's Spring Break vacation starting March 8, 2024 and returning on March 18,
26 2024. Plaintiff's counsel therefore requested and received a stipulated extension of time for all of
27 this good cause shown.

28 5. Courts in the District of Nevada have routinely held that extensions of deadlines for

1 illness and the “practicalities of life” establish good cause for the requested extension. *Morales v.*
2 *McDaniel*, 2019 U.S. Dist. LEXIS 173103 (D. Nev. Oct. 3, 2019).

3 6. These extensions of time are not sought for any improper purpose or other purpose of
4 delay. Rather, they are sought to allow the deadlines, which all fall on the same date while
5 Plaintiff’s counsel is out of the country and relying on cruise ship Wi-Fi, to be staggered to two
6 different dates in April to provide sufficient time for counsel for Plaintiff to prepare and file her
7 objection to bill of costs and response to motion for attorneys’ fees due to her illness during and after
8 trial, out of state travel, prior issues with cruise ship Wi-Fi, and her daughter’s Spring Break
9 vacation from March 8-17, 2024.

10 7. Through this stipulation, Plaintiff requests that the Court **extend the deadline for**
11 **Plaintiff to file her objection to Defendant’s Bill of Costs from the current deadline of March 12,**
12 **2024 until April 2, 2024 and extend her deadline to file her response to Defendant’s Motion for**
13 **attorneys’ Fees from the current deadline of March 12, 2024 until April 5, 2024.**

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1 WHEREFORE, the parties respectfully request that the Court extend the deadlines as
2 stipulated to and requested herein.

3 DATED this 8th day of March, 2024.

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5 MELANIE HILL LAW PLLC

KAMER ZUCKER ABBOTT

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17 **IT IS SO ORDERED.**

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19 3/12/24

20 **DATE**

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UNITED STATES DISTRICT JUDGE